



## **Registration of Provider Organizations Draft Data Submission Manual**

**May 15, 2015**

Hallmark Health PHO, Inc. would like to provide the following feedback on the Health Policy Commission (HPC) Data Submission Manual (DSM):

- Extremely time-consuming and complex
- Reasons for collecting data are not clear
- Definitions are not clear
- Data will very difficult to collect

### **Following are some specific examples:**

- **RPO 51-53** asks for the name of the contracting entity that establishes contracts on behalf of the corporate affiliate although this is followed in the next section by an entire file with multiple questions on contracting affiliates and entities.
- **RPO 56-57** is duplicative.
- **RPO 66** requires us to provide the name of each contracting entity that establishes contracts on behalf of a contracting affiliate. We do not have all of this information for all our affiliates and will be very burdensome to collect.
- **Physician Roster File:** Many of our physicians belong to multiple contracting entities so we will be providing the same information multiple times.
- **RPO 126 and RPO 130** require us to list each organizational NPI associated with Local Practice Groups. As this information is requested for each physician, the same information will need to be provided multiple times (i.e., for each physician in each Local Practice Group). This reporting also appears to duplicate information already provided in the Physician Roster File.
- **RPO 58-61** requires reporting on unassociated corporation: This will be very difficult to collect from all our affiliated health system and provider entities.
- **PO73-77 requires detailed information about global payments** and how they are dispersed across contractual affiliates. Why is this information being requested? The DOI already collects this information.